

# EXHIBIT 6

**From:** Andrew J. Maloney <AMaloney@kreindler.com>  
**Sent:** Tuesday, February 11, 2020 7:17 PM  
**To:** Moore, Kelly A.; Maloy, John M.  
**Cc:** Andrew Shen (ashen@kellogghansen.com); Michael K. Kellogg (mkellogg@kellogghansen.com); Rapawy, Gregory G.; Steven R. Pounian; Sean P. Carter - Cozen O'Connor (scarter1@cozen.com); zScott Tarbutton; zRobert Haefele; Jerry S. Goldman (jgoldman@andersonkill.com); Kry, Robert (rkry@mololamken.com); 'enitz@mololamken.com'; Jim Kreindler; John Fawcett  
**Subject:** Deposition Questions for Alzamari  
**Attachments:** 632886 (00000004).docx; Akram (00000004).pdf

[EXTERNAL EMAIL]

Kelly,

After the last round of edits and objections, I made one new set of edits with regard to the objections you made [REDACTED]

[REDACTED] Nothing else was changed since the last exchange of objections and the number questions should be the same.

All objections lodged in the last round are preserved and need not be made again (unless you really want to).

I have attached the final version in a clean pdf for the court reporter and believe you already have the pdf of our Re-Direct Exam.

Please let us know the earliest date that Mr. Alzamari will appear for his deposition so that we can alert the court reporter and the Court.

Regards,  
Duke

**Andrew J. Maloney**  
Partner



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**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**PLAINTIFFS' NOTICE OF DEPOSITION AND DIRECT EXAMINATION BY WRITTEN QUESTIONS FOR NON-PARTY WITNESS AKRAM ALZAMARI**

PLEASE TAKE NOTICE that pursuant to the May 29, 2019 Order of this Court, docket entry 4564, and Rules 30 and 31 of the Federal Rules of Civil Procedure, Plaintiffs, by their counsel the Plaintiffs' Executive Committees, hereby demand that non-party witness Akram Alzamari orally answer the written questions under oath before a certified court stenographer of the Golkow Reporting firm, and while being videotaped by a certified videographer, also provided by the Golkow Litigation Services. The deposition shall commence on **[NEW DATE]** beginning at 9:00am Pacific time at the law offices of Golkow Litigation Services at The First Allied Plaza 655 W. Broadway, Suite 880, San Diego, CA 92101.

PLEASE TAKE FURTHER NOTICE that the Direct Questions set forth below are being provided to Mr. Alzamari's counsel, Kelly Moore, Esq., of Morgan Lewis & Bockius LLP, to allow his counsel to raise objections as provided in the Court's Order in advance of the deposition. These Direct Examination Questions and any Cross, Redirect, and Re-Cross Questions, shall be read by the certified court reporter or his/her designee to ask the witness each question; the witness must answer each question while under oath, in his own words, and not from a prepared response; and, the reporter and videographer shall record the answers verbatim.

PLEASE TAKE FURTHER NOTICE that the Plaintiffs' Executive Committees have assigned the following attorney point of contact for this deposition:

Andrew J. Maloney, Esq.  
Kreindler & Kreindler LLP  
750 Third Avenue  
New York, NY 10017  
Phone: 212-973-3438  
[amaloney@kreindler.com](mailto:amaloney@kreindler.com)

PLEASE TAKE FURTHER NOTICE that Plaintiffs continue to object to this written deposition procedure, and reserve their rights to demand an oral deposition of the witness after the completion of the deposition upon written questions, or to seek such other appropriate relief that may be necessary in the interests of justice. Objections lodged by defense counsel and by the witness's lawyer have been served and preserved and need not be lodged verbally before the witness at the deposition.

### **PLAINTIFFS' DIRECT WRITTEN QUESTIONS FOR AKRAM ALZAMARI**

Please advise the witness that unless the question begins with the words "Before and after September 11, 2001:" all of the Direct Questions relate to events that occurred on dates prior to and including September 11, 2001, and not after that date.

Where a question is preceded by "[If so]" or otherwise conditioned on a certain answer to a prior question, such follow up questions will only be asked if the condition is first satisfied. Subject headings are not questions and need not be read to the witness. The witness should be instructed that "all answers to questions should be based on your personal knowledge, and/or observations, and are intended to elicit the basis of your knowledge on how you know those answers."

#### **Background**

1. Please state and spell your name for the record.
  - 1.a DELETED
2. Have you ever used any other names, nicknames, or aliases?
  - a. [If so,] state and spell any other names.
    - i. [If so,] When did you use each other name?
    - ii. [If so,] Why did you use each other name?
  - b. [If so,] State and spell other nicknames.
    - i. [If so,] When did you use each nickname?
    - ii. [If so,] Why did you use each nickname?
  - c. [If so,] State and spell any other aliases that you have used.
    - i. [If so,] When did you use each other alias?

ii. [If so,] Why did you use each other alias?

3. Please state your date and place of birth?
4. Please state [REDACTED]?
  - a. What degrees, if any, did you obtain from [REDACTED]?
  - b. [REDACTED] When did you obtain those degrees?
5. Please identify all other places that you have resided from September 11, 1991 through September 11, 2001, identifying the locations and the times of residency.
6. Between September 11, 1991 and September 11, 2001, please identify all countries to which you have travelled for more than a day, identifying the countries, the times that you were there, and the reasons for the visits.
7. When did you first travel to the United States?
8. Have you lived continuously in the U.S. since that time?
9. Why did you come to the U.S.?
10. When did you become a U.S. citizen?
11. Please state where and when you attended college and graduate school.
  - a. [REDACTED] identify any degrees that you have obtained – including where you obtained it, when, and the area of study.

[REDACTED]
12. [REDACTED]
13. Directing your attention to the period of time from January 1, 1995 through September 2001, to the best of your recollection, please identify the addresses of each place where you lived during that period, including the location and the dates that you lived at each address.
14. Did you live with anyone else during the period from January 1, 1995 through September 2001?
  - a. [If so,] Who else did you live with during the period from January 1, 1995 through September 2001?

- b. [If so, as to each] At what address did you live with each person?
  - c. [If so, as to each] When did they live with you?
- 15. Were you employed from January 1, 1995 through September 2001?
- 16. [If so,] Please list each of your employers and their location, and when you worked there.
  - a. [As to each,] What was your job title and what you did for each employer.
- 17. Did you regularly attend religious or other services at a mosque and/or at any Islamic centers in California during the period from January 1, 1995 through September 2001?
- 18. What mosques and Islamic centers did you attend in California, where were they located, and when did you attend?
- 19. Which services did you regularly attend at each location that you identified?
  - a. As to each service you attended regularly, for what time period did you attend that service regularly?

**Fahad al-Thumairy**

Showing you photo Exhibit 7 [Fahad al-Thumairy]

- 20a
  - i. do you recognize this man as someone you saw prior to the 9/11 attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] how did you address him when you met him in person?
  - iv. [if so] what other information can you remember about this man?
  - v. [if so] when and where do you remember seeing this man prior to 9/11?
  - vi. [if so] describe your relationship with this man prior to 9/11?
- 20. Did you know Fahad al-Thumairy?
- 21. When did you first meet Fahad al-Thumairy?
- 22. How did you come to meet Fahad al-Thumairy?

- 23. Where did you first meet Fahad al-Thumairy?
- 24. Before or after September 11, 2001: When was the last time that you saw Fahad al-Thumairy in person?
- 25. What were the circumstances under which you last saw Fahad al-Thumairy in person?
- 26a. Can you describe your relationship with Fahad al-Thumairy in the 1995-2001 time period?
- 26b. Did you consider Fahad al-Thumairy to be your friend, and if so, how close were you?
- 27a. What language did you typically use to communicate with Fahad al-Thumairy?
- 27b. What language did you observe Fahad al-Thumairy typically use to communicate with others when you saw him in or around Los Angeles?
- 27c. How was al-Thumairy's English?
- 27d. Did he ever use anyone to translate for him?
- 27e. [If so,] Who did he use to translate for him?
- 27f. [If so] Do you know where that person is or how to get in touch with that person?
- 27g. [If so,] Where is that person or how can that person be contacted?
- 28a. Did you and al-Thumairy contact each other by email?
- 28b. [If so,] What email address or addresses did al-Thumairy use?
- 29a. Did you and al-Thumairy contact each other by phone, either land line or cell phone?
- 29b. [If so] What were the land line and cell phone numbers that you used to call al-Thumairy?
- 29c. [If so] What were your land line and cell phone numbers that Thumairy used to call you?
- 30a. Did you ever hear Fahad al-Thumairy talk about his employment?
- 30b. [If so,] What did he say about his employment?
- 30c. Did you ever hear Fahad al-Thumairy talk about who he reported to in his job?

- 30d. [If so,] When did that occur?
- 30e. [If so,] What did al-Thumairy say about who he reported to in his job?
- 31a. At the time you knew him in Los Angeles, were you aware that Fahad al-Thumairy was employed by the Saudi government?
- 31b. [If so,] Based on your personal knowledge and/or observations, what was your understanding of Fahad al-Thumairy's job for the Saudi government?
- 31c. Where did al-Thumairy work?
- 31d. Who did he report to?
- 31e. [If so] How did you know that?
- 32a. Did you ever hear Fahad al-Thumairy talk about his work for the Kingdom of Saudi Arabia?
- 32b. [If so,] To the best of your recollection, when did he make the statements?
- 32c. [If so,] What did al-Thumairy say about his work for the Kingdom of Saudi Arabia?
- 33a. Did Fahad al-Thumairy ever talk about working at the Saudi Consulate in Los Angeles?
- 33b. Did al-Thumairy describe where his work office was located?
- 33c. [If so,] To the best of your recollection, when did he offer that description?
- 33d. [If so,] What did al-Thumairy say about where his work office was located?
- 33e. Did you ever see his work office?
- 33f. [If so,] Where was it?
- 33g. [If so,] What were the circumstances that occasioned you being in his office?
- 34a. Did you ever hear Fahad al-Thumairy complain about his work and/or his superiors?
- 34b. [If so,] To the best of your recollection, when did al-Thumairy complain?
- 34c. [If so,] What did al-Thumairy say in complaining about his work or his superiors?



- 35a. Did you ever hear Fahad al-Thumairy say that he was a diplomat for Saudi Arabia or that he held a diplomatic visa?
- 35b. [If so,] To the best of your recollection, when did al-Thumairy say that?
- 35c. [If so,] What did al-Thumairy say about being a diplomat for Saudi Arabia or about holding a diplomatic visa?
- 36a. Did Fahad al-Thumairy ever talk about his relationships with any Saudi government personnel?
- 36b. [If so,] To the best of your recollection, when did that occur and what did al-Thumairy say?
- 37a. Did you ever hear Fahad al-Thumairy express any criticism of the United States or its government?
- 37b. [If so,] To the best of your recollection, when did you hear this?
- 37c. [If so,] What did al-Thumairy say in criticism of the United States or its government?
- 38a. Did Fahad al-Thumairy ever send customers to you when you were working at Circuit City?
- 38b. [If so] Did Fahad al-Thumairy ever provide you with the names of customers when you were working at Circuit City?
- 38c. [If so,] If Fahad al-Thumairy sent you customers or provided you with customer names, to the best of your recollection, who were those customers?
- 38d. [If so,] What did al-Thumairy say to you about each of those customers?
- 39a. Did al-Thumairy ever introduce you to any Saudi government personnel, either in person or by either giving you their name, or providing your name to them?
- 39b. [If so,] To the best of your recollection, who were those personnel?
- 39c. [If so] What, if anything, did al-Thumairy say to you about them?
- 39d. [If so] What, if anything, did you learn about the positions those personnel held?
- 39e. [If so.] How did you learn that?

- 39f. Did you ever hear al-Thumairy speak about any Saudi government personnel who were visiting Los Angeles or the King Fahad Mosque?
- 39g. [If so,] To the best of your recollection, who were those personnel?
- 39h. [If so,] What did al-Thumairy say about them?
- 40a. Were any of your customers at Circuit City Saudi government officials, including Saudi Consulate officials?
- 40b. [If so,] Who were those officials, and what interactions did you have with those officials?
- 40c. Did you know any Saudi government officials, including officials from the Saudi Consulate in Los Angeles?
- 40d. [If yes,] What is or are the name or names of the Saudi government officials you know?
- 40e. [If yes,] What is the title and position of the Saudi government officials you know?
- 40f. [If yes,] How do you know these Saudi government officials?
- 40g. Have you met any members of the Saudi Royal Family?
- 40h. [If yes] Who did you meet and when?
- 40i. [If yes] Describe the circumstances of the meeting, who was there and what was said and by whom?

Showing you a photo marked as Exhibit 14 [Prince Abdulaziz]

- 40j (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] what other information can you remember about the man?
  - iv. [if so] when and where do you remember seeing the man prior to 9/11?
  - v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.
- 40j. Have you ever met Prince Abudulaziz bin Fahd?

- 40k. [If so] When, where, and why?
- 40l. [If yes] Describe the circumstances of the meeting, who was there, and what was said and by whom?
- 40m. Have you ever met Khalid bin Nasser al Assaf?
- 40n. [If yes] When, where, and why did you meet Khalid bin Nasser al Assaf?
- 40o. [If yes] Describe the circumstances of the meeting, who was there, and what was said and by whom?
- 40p. To the extent that you interacted with any Saudi government officials, including Consulate officials, when did that happen?
- 40q. [If so] Describe the conversations that you have had with any Saudi government officials.
- 41a. [If so,] To the best of your recollection, please state when each conversation happened?
- 42a. Did you ever hear Fahad al-Thumairy speak about any of the Saudi government personnel at the Consulate in Los Angeles?

Showing you photo Exhibit 13 [Mohamed al Salloum]

- 42b (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?
- ii. [if so] what is the man's name?
- iii. [if so] what other information can you remember about the man?
- iv. [if so] when and where do you remember seeing the man prior to 9/11?
- v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11. 42b. Did you ever hear him speak about the Consul General Mohammed al-Salloum?
- 42c. Did you ever hear him speak about another official, Abdullah al-Awad?
- 42d. If so, to the best of your recollection, when did that happen and what did al-Thumairy say?
- 43a. Did you ever hear Fahad al-Thumairy talk about any Saudi government officials at the Embassy in Washington, D.C.?

43b. [If so,] To the best of your recollection, when did that happen?

43c. [If so,] What did al-Thumairy say about any Saudi government officials at the Embassy in Washington, D.C.?

Showing you photo Exhibit 10 [Musaed al-Jarrah]

44a (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

44a. Did you ever hear Fahad al-Thumairy talk about an Embassy official named Musaed al-Jarrah?

44b. [If so,] To the best of your recollection, when did that occur and what did al-Thumairy say?

Showing you photo Exhibit 12 [Khalid al-Sowailem]

44c (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

44c. Did you ever hear Fahad al-Thumairy talk about an Embassy official named Khalid al-Sowailem?

- 44d. [If so,] To the best of your recollection, when did that occur and what did al-Thumairy say?
- 45a. Did Fahad al-Thumairy ever talk about the role of the Kingdom of Saudi Arabia, including its Consulate in Los Angeles, in the operation of the King Fahad Mosque?
- 45b. [If so,] To the best of your recollection, when did that discussion happen and what did al-Thumairy say?
- 46a. Based on your personal knowledge and/or observations do you have an understanding of the role of the Saudi government in the operation of the King Fahad Mosque prior to September 11, 2001?
- 46b. Based on your personal knowledge and/or observations what is your understanding of the role of the Saudi government in the operation of the King Fahad Mosque prior to September 11, 2001?
- 46c. [If so,] What is the basis for your understanding?
- 47a. Did you ever hear Fahad al-Thumairy talk about Saudi government intelligence personnel in the United States, including at the Saudi Consulate in Los Angeles?
- 47b. [If so,] To the best of your recollection, when did that talk occur and what did al-Thumairy say?
- 47c. Did you ever hear Fahad al-Thumairy talk about hosting or meeting with visitors from the Saudi government, including from the Ministry of Islamic Affairs?
- 47d. [If so,] To the best of your recollection, when did that talk occur?
- 47e. [If so,] What did al-Thumairy say about hosting or meeting with visitors from the Saudi government, including from the Ministry of Islamic Affairs?
- 47f. Did you have occasion to observe any Saudi government visitors hosted by or meeting with al-Thumairy?
- 47g. [If so,] Please tell us what you recall observing.
- 47h. [If so] Tell us the names and positions of any Saudi government visitors that you observed meeting with Al-Thumairy?
- 47i. [If so,] Was al-Thumairy hosting them?

- 47j. [If so,] What was the purpose of the visitors' trip to Los Angeles?
- 47k. [If so,] Did you meet them?
- 47l. [If so,] When did you meet with them?
- 47m. [If so,] What was the purpose of your meeting with them?
- 47n. [If so,] Who else was present for that meeting?
- 47o. If you had or overheard any conversations with any Saudi government visitors, please tell us what you heard, who else was present during the conversations, and when the conversations occurred.
- 48a. Based on your personal knowledge and/or observations what understanding do you have, if any, as to the role of the Saudi government intelligence personnel in the United States prior to September 11, 2001?
- 48b. [If so,] Can you please explain the basis for your understanding?
- 49a. Do you know if Fahad Thumairy was receiving a salary and/or expenses?
- 49b. [If yes] How do you know this?
- 49c. [If yes] Who was paying Thumairy his salary and/or his expenses?
- 49d. Do you know if Thumairy was receiving money that he used to fund or pay other people or entities?
- 49e. [If yes] How do you know this?
- 49f. [If yes] Where was Thumairy getting the money from?
- 49g. [If yes] Who was Thumairy paying the money to?
- 49h. [If yes] Do you have an estimate of any of the dollar amounts that Thumairy received and what time period that was when he was funding others?
- 49i. [If yes] Do you have an estimate as to how much Thumairy paid to others during the time period 1998-2001?

**Ibn Tammiyah Mosque**

- 50a. Did you attend the Ibn Tammiyah Mosque on Venice Boulevard in Los Angeles, California?

- 50b. [If so,] During what period of time did you attend the Ibn Tammiyah Mosque?
- 51. Why did you choose to go to that particular Mosque?
- 52. How often did you typically attend the Ibn Tammiyah Mosque?
- 53. Was Fahad al-Thumairy an Imam at the Ibn Tammiyah Mosque when you attended the Mosque?
- 54. What was the role of Fahad al-Thumairy at that Mosque?
- 55. Who did you observe deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque when you attended that Mosque?
- 56a. Did you ever observe Fahad al-Thumairy deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque?
- 56b. [If so,] How often and when did you observe Thumairy deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque?
- 56c. [If so,] Did you observe him deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque on more than one occasion?
- 56d. [If so,] Can you approximate a number of times you observed Fahad al-Thumairy deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque?
- 56e. Did you ever hear that Sheik Omar Abdul Rahman - who was known as “the Blind Sheik” - had visited the Ibn Tammiyah Mosque?
- 56f. [If so,] Please describe what you heard, and describe what was said, and by whom.

**King Fahad Mosque**

- 57a. Did there come a time when you attended the King Fahad Mosque on Washington Boulevard in Culver City, California?
- 57b. [If so,] During what period of time did you attend the King Fahad Mosque?
- 58. Why did you choose to go to that particular Mosque?
- 59. How often did you typically attend the King Fahad Mosque?

- 60. Was Fahad al-Thumairy the Imam at the King Fahad Mosque when you attended the Mosque?
- 61. What was the role of Fahad al-Thumairy at that Mosque?
- 62a. Did you ever observe Fahad al-Thumairy deliver the Friday Khutbah prayer at the King Fahad Mosque?
- 62b. [If so,] How often and when did you observe Thumairy deliver the Friday Khutbah prayer at the King Fahad Mosque?
- 62c. [If so,] Did you observe him deliver the Friday Khutbah prayer at the King Fahad Mosque on more than one occasion?
- 62d. [If so,] Can you approximate a number of times you observed Fahad al-Thumairy deliver the Friday Khutbah prayer at the King Fahad Mosque?
- 63a. Did you ever hear Fahad al-Thumairy talk about instructions he received from the Saudi Consulate or the Saudi government regarding the King Fahad Mosque?
- 63b. [If so,] To the best of your recollection, when did you hear this and what did al-Thumairy say?
- 64a. Based on your personal knowledge and/or observations had you heard of the Saudi Ministry of Islamic Affairs, and its involvement in the operation of the King Fahad Mosque?
- 64b. What had you heard, and from whom?
- 64c. Based on your personal knowledge and/or observations what understanding, if any, do you have regarding any role the Saudi government may have in appointing the Imam for the King Fahd Mosque?
- 65. Can you describe your relationship with the Board members of the King Fahad Mosque, Dr. Khalil al-Khalil and Dr. Osman Kaldirim?
- 66a. Did you ever hear Fahad al-Thumairy talk about Dr. Khalil al-Khalil?
- 66b. [If so,] To the best of your recollection, when did al-Thumairy talk about Dr. al-Khalil and what did al-Thumairy say?
- 67a. When you were working at Circuit City, did Dr. Khalil ever send customers to you or provide you with the names of customers?



- 67b. [If so,] What did he do to refer you customers?
- 67c. [If so,] To the best of your recollection, who were those customers?
- 67d. [If so,] What did Dr. Khalil say to you about those customers that he referred to you?
- 68a. Did you ever hear Fahad al-Thumairy talk about Osman Kaldirim?
- 68b. [If so,] To the best of your recollection, when did al-Thumairy talk about Kaldirim and what did al-Thumairy say?
- 69a. Do you remember any occasion when al-Thumairy offered to introduce you to the influential inner circle of people at the King Fahad Mosque?
- 69b. [If so,] To the best of your recollection, what did he say to you, and how did you respond?
- 69c. [If so] Who, if anyone, did al-Thumairy tell you were the members of that influential inner circle at the King Fahad Mosque?
- 70a. Do you know the names of any of the drivers that the King Fahd Mosque used in the year 2000?
- 70b. [If so,] Who were those drivers?
- 70c. [If so,] Please provide us with any contact information for each driver that you recall the King Fahd Mosque using in the year 2000.
- 70d. [If so,] Who did those drivers transport and where did they typically go?
- 70e. [If so,] Did the drivers pick up visitors arriving at the airport?
- 70f. [If so,] Please state what you recall about any occasion when a driver for the Mosque picked up a visitor at the airport.
- 71a. Were you aware of any faction of people who attended the King Fahad Mosque who held an extremist view of Islam?
- 71b. [If so,] Who were they and what did you observe about their extremist view of Islam?
- 71c. Was Fahad al-Thumairy associated with this faction?

71d. [If so,] Please explain how al-Thumairy was associated and describe what you observed?

Showing you photo Exhibit 9 [Mohamed al-Muhanna]

71e (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

71e. [If so] Was Mohamed al-Muhanna associated with this faction with extremist views?

71f. [If so,] Please explain how al-Muhanna was associated and describe what you observed?

### **Grand Opening**

72. Did you attend the Grand Opening ceremonies of the King Fahad Mosque?

73a. [If so] Did you observe any Saudi government officials at the Opening?

73b. [If so,] Who were those officials and what did you observe?

74a. [If so] Did Fahad al-Thumairy talk about the Grand Opening of the King Fahad Mosque, and his duties during the Grand Opening?

74b. [If so,] To the best of your recollection, when did that occur?

74c. [If so,] What did al-Thumairy say about the Grand Opening?

75a. [If so] Did you observe al-Thumairy with other Saudi government officials or visitors at the Grand Opening?

75b. [If so,] Who was al-Thumairy with?

75c. [If so,] What was he doing?

75d. [If so] Did Thumairy meet with Prince Abudulaziz bin Fahd at the Grand Opening of the King Fahd Mosque?

75e. [If so,] Please describe their interactions, and tell us your knowledge of what they said to one another, and the basis for that knowledge?

**Saudi Consulate**

76a. Did you ever go to the Saudi Consulate in Los Angeles?

76b. [If so,] When did you go?

76c. [If so,] Who did you meet with and why?

77a. Did al-Thumairy offer to introduce you to important or influential Saudi officials at the Saudi Consulate?

77b. [If so,] When did that occur – that is, when did he make that offer to you?

77c. [If so,] What did al-Thumairy say to you?

77d. [If so,] What happened as a result?

78a. Did the Saudi Consulate employ drivers to pick up visitors when they arrived at the airport in Los Angeles?

78b. Did the Saudi Consulate employ drivers to drive visitors around Los Angeles?

78c. [If so,] When do you recall instances of the Saudi Consulate employing drivers either to pick visitors up from the airport or drive visitors around Los Angeles?

78d. [If so,] Who were those drivers?

78e. [If so,] Tell us what you remember about any trips that the drivers took?

78f. Did the Saudi Consulate ever use drivers from the King Fahd Mosque to pick up visitors arriving at the airport?

78g. [If so,] When did that happen?

78h. [If so,] Who were the drivers from the King Fahd Mosque that the Saudi Consulate used?

78i. [If so,] Tell us what you remember about any trips that they took?

**Mohamed al-Muhanna**

- 79. Did you know Mohamed al-Muhanna?
- 80. [If so] Can you describe your relationship with Mohamed al-Muhanna?
- 81a. Did you ever hear Fahad al-Thumairy talk about Mohamed al-Muhanna?
- 81b. [If so,] To the best of your recollection, when did you hear al-Thumairy talk about al-Muhanna?
- 81c. [If so,] What did al-Thumairy say about al-Muhanna?
- 82a. [If so] Where was Mohamed al-Muhanna employed?
- 82b. [If so] What is your understanding of what al-Muhanna's job entailed?
- 82c. [If so] How did you know that?
- 83a. [If so] Did al-Muhanna have any responsibilities at the King Fahad Mosque?
- 83b. [If so,] What were those responsibilities?
- 84a. [If so] Did you ever hear Mohamed al-Muhanna express any criticism of the United States or its government?
- 84b. [If so,] To the best of your recollection, when did you hear this?
- 84c. [If so,] What did al-Muhanna say?

**Smail Mana**

- 85. Did you know Smail Mana?
- 86. [If so] Can you describe your relationship with Smail Mana?
- 87a. Did you ever hear Fahad al-Thumairy talk about Smail Mana?
- 87b. [If so,] To the best of your recollection, when did you hear al-Thumairy talk about Smail Mana?
- 87c. [If so,] What did al-Thumairy say about Smail Mana?

- 88a. [If so] Where was Smail Mana employed?
- 88b. [If so] What is your understanding of what Mana's job entailed?
- 88c. [If so] How did you know that?
- 89a. [If so] Did Mana have any responsibilities at the King Fahad Mosque?
- 89b. [If so,] What were those responsibilities?
- 89c. [If so,] What, if anything, did you observe him do?
- 90a. [If so] Did you ever have any conversations with Smail Mana?
- 90b. [If so,] To the best of your recollection, tell us what Smail Mana said and what you said in that conversation.
- 90c. [If so] Did you ever hear Smail Mana express any criticism of the United States or its government?
- 90d. [If so,] To the best of your recollection, when did you hear this?
- 90e. [If so,] What did Mana say?

**Minister of Islamic Affairs**

- 91a. Did you ever hear Fahad al-Thumairy talk about Saudi Minister of Islamic Affairs Abdullah al-Turki?
- 91b. [If so,] To the best of your recollection, when did al-Thumairy mention Minister al-Turki?
- 91c. [If so,] What did al-Thumairy say about Saudi Minister of Islamic Affairs Abdullah al-Turki?
- 91d. Did you ever hear Fahad al-Thumairy talk about Saudi Minister of Islamic Affairs Saleh al-Shaikh?
- 91e. [If so,] To the best of your recollection, when did al-Thumairy mention Minister al-Shaikh?
- 91f. [If so,] What did al-Thumairy say about Saudi Minister of Islamic Affairs Saleh al-Shaikh?

**Omar al-Bayoumi**

Showing you photo Exhibit 8 [Omar al Bayoumi]

- 92a i. do you recognize this man as someone you saw prior to the 9/11 Attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] what other information can you remember about this man?
  - iv. [if so] when and where do you remember seeing this man prior to 9/11?
  - v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy prior to 9/11.
  - vi. [if so] describe your relationship with this man prior to 9/11?
92. Did you know or had you heard of Omar al-Bayoumi?
93. [If so] Can you describe your relationship with Omar al-Bayoumi?
- 94a. Did Fahad al-Thumairy ever mention Omar al-Bayoumi?
- 94b. [If so,] To the best of your recollection, when did al-Thumairy mention al-Bayoumi?
- 94c. [If so,] What did al-Thumairy say about Omar al-Bayoumi?
- 95a. [If you knew Omar al-Bayoumi,] At the time you knew him, did you know whether Omar al-Bayoumi was employed?
- 95b. [If so,] What was your understanding of al-Bayoumi's job?
- 95c. [If so,] How did you know that?
- 96a. [If so] Did you ever see Omar al-Bayoumi at the Ibn Tammiyah Mosque?
- 96b. [If so] Did you ever see Omar al-Bayoumi at the King Fahad Mosque?
- 96c. [If so] [If you ever saw Omar al-Bayoumi at either mosque,] Please describe when and where you saw Omar al-Bayoumi?
- 96d. [If so,] Who else was present at each occasion that you recall seeing Omar al-Bayoumi?

- 96e. [If so] Describe the content of any conversations of al-Bayoumi that you heard, including the content of the conversation and the participants of the conversation.

**Anwar Aulaqi**

Showing you photo Exhibit 11 [Anwar Aulaqi]

- 97a i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

97. Did you know Anwar Aulaqi?

98a. [If so,] Describe your relationship with Anwar Aulaqi, including how and when you met him.

98b. [If so] Are you aware of any visits of Anwar Aulaqi to the Los Angeles area, including the Ibn Tammiyah Mosque or the King Fahad Mosque?

98c. [If so,] Describe when and what the circumstances were?

98d. [If so,] Who met with Aulaqi?

98e. [If so,] Who was present at the meetings?

98f. [If so,] What was said and by whom?

99a. [If so] Did you ever speak with Aulaqi?

99b. [If so,] When and where did that occur?

99c. [If so,] What did you talk to him about?

99d. [If so,] Who else was present?

**Mohamed Johar**

Showing you photo Exhibit 6 [Mohamad Johar]

- 100a i. do you recognize this man as someone you saw prior to the 9/11 Attack?

- ii. [if so] what is the man's name?
- iii. [if so] how did you address him when you met him in person?
- iv. [if so] what other information can you remember about this man?
- v. [if so] when and where do you remember seeing this man prior to 9/11?
- vi. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy prior to 9/11.
- vii. [if so] describe your relationship with this man prior to 9/11?

100. Did you know Mohamed Johar?

101. [If so,] When and where did you first meet Mohamed Johar?

102. When was the last time that you saw Mohamed Johar in person,

103. What were the circumstances under which you last saw him?

104. When was the last time you had any communication with him?

105. Can you describe your relationship with Mohamed Johar?

106a. Did you consider Mohamed Johar to be your friend?

106b. [REDACTED]

107. Where did Mohamed Johar live in January 2000?

108a. Can you describe the building where Mohamed Johar lived in January 2000?

108b. Did you ever visit the building where Mohamed Johar lived [REDACTED]

108c. [If so,] How often did you visit Johar at that building

108d. [If so,] What was the purpose of your visits to that building?

108e. [REDACTED]



108f.

109b.

109c.

110.

111. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

112a. Does this passage help refresh your recollection that [REDACTED]

112b. Is the passage true?

112c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

113.

116b. [REDACTED]

117b. [REDACTED]

117c. Please review this photo Exhibit. 3 [Khalid al Mihdhar] Do you recognize this man as someone you saw prior to the 9/11 Attack?

117d. [If so] What is the man's name?

117e. [If so] How did you address him when you met him in person?

117f. [If so] Is this one of the two [Saudi men who would later become 9/11 hijackers?](#) [REDACTED]

117g. Please review this photo Ex. 4 [Nawaf al Hazmi]

117h. Do you recognize this man as someone you saw prior to the 9/11 Attack?

117i. [If so] What is the man's name?

117j. [if so] How did you address him when you met him in person?

117k. [if so] Is this one of the two [Saudi men who would later become 9/11 hijackers?](#) [REDACTED]

118a. Did you ever learn that the two [Saudi men who would later become 9/11 hijackers](#) [REDACTED] were both associated with or supporters of Osama Bin Laden and/or al Qaeda?

118b. [If so,] When did you learn about the support or association of the two men with Osama Bin Laden and/or al Qaeda?

118c. [If so,] How did you learn about the support or association of the two men with Osama Bin Laden and/or al Qaeda?

118d. [If so,] What did you learn about the support or association of the two men with Osama Bin Laden and/or al Qaeda?

118e. Did you ever suspect or receive information that the two [Saudi men who would later become 9/11 hijackers](#) [REDACTED] were both in the United States to carry out some assignment for Osama Bin Laden and/or al Qaeda?

118f. [If so,] To the best of your recollection, when did you learn about their assignment?

118g. [If so,] How did you learn about their assignment?

118h. [If so,] What did you learn about their assignment?

118i. Before or after September 11, 2001: When and how did you learn that the two [Saudi men who would later become 9/11 hijackers](#) [REDACTED] were hijackers involved in the 9/11 Attacks?

119a. Before or after September 11, 2001: Did there come a time when you learned the names of the two [Saudi men who would later become 9/11 hijackers](#)? [REDACTED]

119b. [If so,] What were those names?

119c. [If so,] Before or after September 11, 2001: When and how did you learn the names of the two men?

119d. Is it correct that the names of the two men were Nawaf al-Hazmi and Khalid al-Mihdhar?

120a.

120b.

120c.

120d.

121a.

121b.

122. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

123a. Does this passage help refresh your recollection that [REDACTED]  
[REDACTED]

123b. Is it correct that [REDACTED]  
[REDACTED]?

123c. Otherwise, is this passage true?

123d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

124a. [REDACTED]

124b. [REDACTED]

125a. [REDACTED]  
[REDACTED]

125b. [REDACTED]

126. [REDACTED]  
[REDACTED]

127. [REDACTED]

128a. [REDACTED]  
[REDACTED]

128b. [REDACTED]

128c. [REDACTED]

129a. [REDACTED]  
[REDACTED]

129b. [REDACTED]

129c. [REDACTED]

130a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

130b. Does this passage help refresh your recollection regarding [REDACTED]

[REDACTED]

130c. Is the passage true?

130d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

131. Is it correct that you [REDACTED]

[REDACTED]

132a.

[REDACTED]

132b.

[REDACTED]

132c.

[REDACTED]

132d.

[REDACTED]

133.

[REDACTED]

134.

[REDACTED]

135.

[REDACTED]

136a.

[REDACTED]

136b.

[REDACTED]

137a. [REDACTED]

137b. [REDACTED]

137c. [REDACTED]

138a. [REDACTED]

138b. [REDACTED]

138c. [REDACTED]

139a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

139b. Does this interview passage help refresh your recollection of [REDACTED]

139c. Is the passage accurate?

139d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error, and explain why you say that the statement contains an error or errors.

140. [REDACTED]

141. [REDACTED]

142. [REDACTED]
- 143a. [REDACTED]
- 143b. [REDACTED]
- 144a. [REDACTED]
- 144b. [REDACTED]
- 145a. [REDACTED]
- 145b. [REDACTED]
- 146a. [REDACTED]
- 146b. [REDACTED]
- 146c. [REDACTED]
- 146d. Based on your personal knowledge and/or observations what is your understanding [REDACTED]
- [REDACTED]
- 147a. [REDACTED]
- 147b. [REDACTED]
- 148a. [REDACTED]
- 148b. [REDACTED]
- 149a. [REDACTED]

149b. [REDACTED]

149c. [REDACTED]

150a. [REDACTED]

150b. [REDACTED]

150a. [REDACTED]

150b. [REDACTED]

150c. [REDACTED]

150d. [REDACTED]

150e. [REDACTED]

150f. [REDACTED]

151a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

151b. Does this passage help refresh your recollection of [REDACTED]  
[REDACTED]

151c. Is the passage true?

151d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

152. [REDACTED]

153. [REDACTED]

154. [REDACTED]



155.

[REDACTED]

[REDACTED]

156a. Did there come a time when you met in person the two [Saudi men who would later become 9/11 hijackers](#)? [REDACTED]

156b. [If so,] Please describe when and where, you met the two men.

156c. [If so,] How did you come to meet the two men?

156d. Did anyone introduce you to the two men?

156e. [If so,] Who introduced you to the two [Saudi men who would later become 9/11 hijackers](#)? [REDACTED]

157a. Were you told the names of the two men?

157b. [If so,] Who told you?

157c. [If so,] What were you told?

157d. [If so,] What was the context in which you were told the names?

157e. Were the names of the two [Saudi men who would later become 9/11 hijackers](#) [REDACTED]  
[REDACTED] who you met, Nawaf al-Hazmi and Khalid al-Mihdhar?

158a. Did you speak to either of the two men?

158b. [If so,] In what language did you communicate with them?

158c. Did you hear either of the two men speak English?

158d. [If so,] Which of the two men, or both, did you hear speak English?

158e. [If so,] As to either or both that you heard speak English, what was their ability to speak English?

159a. Had you previously seen the two men?

159b. [If so,] Where had you seen them?

160. [If so,] Was anyone else present at that time?

161. [If so,] What was the discussion that occurred at that time?

[REDACTED]

162. [REDACTED]

163. [REDACTED]

164a. [REDACTED]

164b. [REDACTED]

164c. [REDACTED]

164d. [REDACTED]

164e. [REDACTED]

165a. [REDACTED]

165b. [REDACTED]

165c. [REDACTED]

165d. [REDACTED]

165e. [REDACTED]

165f. [REDACTED]

166a. [REDACTED]

166b. [REDACTED]

166c. [REDACTED]

167a. [REDACTED]

167b. [REDACTED]

167c. Based on your personal knowledge and/or observations [REDACTED]  
[REDACTED]

167d.

168a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

168b. Does this passage help refresh your recollection that [REDACTED]

[REDACTED]

168c. Is the passage true?

168d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

169.

[REDACTED]

170.

[REDACTED]

171.

[REDACTED]

172.

[REDACTED]

173a.

[REDACTED]

173b.

[REDACTED]

173c.

[REDACTED]

173d.

[REDACTED]

173e.

[REDACTED]

- 173f. [REDACTED]
- 173g. [REDACTED]
- 174a. [REDACTED]
- 174b. [REDACTED]
- 175a. [REDACTED]
- 175b. [REDACTED]
- 176a. [REDACTED]
- 176b. [REDACTED]
- 176c. [REDACTED]
- 176d. [REDACTED]
- 176e. [REDACTED]
177. [REDACTED]
178. [REDACTED]
179. [REDACTED]
180. [REDACTED]
181. [REDACTED]
182. [REDACTED]

**Mohdar Abdullah**

183. Showing you photo Exhibit 5 [Modhar Abdullah]
- i. Do you recognize this man as someone you saw prior to the 9/11 Attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] how did you address him when you met him in person?

- iv. [if so] what other information can you remember about this man?
- v. [if so] when and where do you remember seeing this man prior to 9/11?
- vi. [REDACTED]
- vii. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy prior to 9/11.
- viii. [if so] describe your relationship with this man prior to 9/11?

184. Where did he live?

185. What did Mohdar Abdullah do for a living?

186. Where did Mohdar Abdullah work?

187. [REDACTED]

188. Based on your personal knowledge and/or observations did you [REDACTED]

189a. [REDACTED]

189b. [REDACTED]

189c. Did Mohdar Abdullah know Fahad al-Thumairy?

189d. [If so,] How do you know that?

190a. Did you ever hear Fahad al-Thumairy talk about Mohdar Abdullah?

190b. [If so,] To the best of your recollection, when did you hear al-Thumairy talk about Mohdar Abdullah?

190c. [If so,] What did you hear Fahad al-Thumairy say about Mohdar Abdullah?

191a. Did you ever hear Mohdar Abdullah talk about Fahad al-Thumairy?

191b. [If so,] To the best of your recollection, when did you hear Mohdar Abdullah talk about Fahad al-Thumairy?

191c. [If so,] What did you hear Mohdar Abdullah say about Fahad al-Thumairy?

**Walid Benomrane**

192. Did you know a man named Walid Benomrane?

193. [If so,] When did you meet Walid Benomrane?

194. [If so,] Where did you meet Walid Benomrane?

195. If so,] What were the circumstances under which you met Walid Benomrane?

196. [If so] Where did he live?

197. [If so] What did he do for a living and where did he work?

198. [If so] Did he ever do any work for the King Fahad Mosque or the Saudi Consulate, and if so, what do you recall?

199. [If so] Did Walid Benomrane know the two men – al-Hazmi and al-Mihdhar?

200. [If so,] What can you tell us about the relationship between Benomrane and al-Hazmi and al-Mihdhar?

201. [If so] Did you ever see Walid Benomrane with the two men?

202. [If so,] Where did you see them together?

203. [If so,] What were the circumstances under which you saw the men together?

204a. [If so] Did Walid Benomrane know Fahad al-Thumairy?

204b. [If so] How do you know that?

205a. Did you ever hear Fahad al-Thumairy talk about Walid Benomrane?

205b. [If so,] To the best of your recollection, when did you hear Fahad al-Thumairy talk about Walid Benomrane?

205c. [If so,] What did you hear Fahad al-Thumairy say about Walid Benomrane?

206a. [If so] Did you ever hear Walid Benomrane talk about Fahad al-Thumairy?

206b. [If so,] To the best of your recollection, when did you hear Walid Benomrane talk about Fahad al-Thumairy?

206c. [If so,] What did Walid Benomrane say about Fahad al-Thumairy?

[REDACTED]

207. [REDACTED]

208. [REDACTED]

209. [REDACTED]

210. [REDACTED]

211. [REDACTED]

212. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

213a. Does this passage help refresh your recollection that [REDACTED]  
[REDACTED]

213b. Is the passage true?

213c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

214. [REDACTED]

215. [REDACTED]

216a. [REDACTED]

216b. [REDACTED]



216c. [REDACTED]

217. [REDACTED]

218. [REDACTED]

219. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

220a. Does this passage help refresh your recollection that [REDACTED]  
[REDACTED]

220b. Is the passage true?

220c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

220d. [REDACTED]

220e. [REDACTED]

221a. [REDACTED]

221b. [REDACTED]

222a. [REDACTED]

222b. [REDACTED]

223. [REDACTED]

224. [REDACTED]

225. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

226a. Does this passage help refresh your recollection regarding [REDACTED]  
[REDACTED]

226b. Is the passage true?

226c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

227. [REDACTED]

228a. [REDACTED]

228b. [REDACTED]

228c. [REDACTED]

228d. [REDACTED]

228e. [REDACTED]

228f. [REDACTED]

228g. [REDACTED]

228h. [REDACTED]

228i. [REDACTED]

228j. [REDACTED]

- 228k. [REDACTED]
- 229a. [REDACTED]
- 229b. [REDACTED]
- 229c. [REDACTED]
- 229d. [REDACTED]
- 230a. Did you ever hear either of the two men – al-Hazmi or al-Mihdhar -express any criticism of the United States or its government?
- 230b. [If so,] To the best of your recollection, please describe each occasion when you heard either of the two men express criticism of the United States or its government, including which of the two men was speaking, what he said, and who was present.
- 231a. Did you ever hear either of the two men – al-Hazmi or al-Mihdhar – talk about Fahad al-Thumairy?
- 231b. [If so,] To the best of your recollection, please describe each occasion when did you heard either of the two men talk about Fahad al-Thumairy, including which of the two men was speaking, what he said, and who was present.
- 232a. Do you recall ever hearing Fahad al-Thumairy talk about either of the two [Saudi men who would later become 9/11 hijackers](#) [REDACTED], Nawaf al-Hazmi and Khalid al-Mihdhar?
- 232b. [If so,] To the best of your recollection, when did that occur?
- 232c. [If so,] What did al-Thumairy say about either of the two men – al-Hazmi or al-Mihdhar?
- 233a. Did you ever learn that the two men – al-Hazmi and al-Mihdhar -had met with Omar Bayoumi?
- 233b. [If so,] How did you learn that either of the two men had met with Omar Bayoumi?
- 233c. [If so,] When did you learn that either of the two men had met with Omar Bayoumi?
- 233d. [If so,] To your understanding, which of the two, or both, met with Bayoumi?
- 233e. [If so,] When did that meeting take place?

- 234a. [REDACTED]
- 234b. [REDACTED]
- 235a. Before or after September 11, 2001: Did the FBI show you pictures of the two men, Nawaf al-Hazmi and Khalid al-Mihdhar, two of the hijackers involved in the 9/11 Attacks?
- 235b. [If so] Were you able to identify those pictures as the persons that you saw with Fahad al-Thumairy?
- 236a. Before or after September 11, 2001: Have you ever seen or been shown any photographs of either Fahad al-Thumairy or Mohamed Johar with either of the 9/11 hijackers, Khalid al-Mihdhar or Nawaf al-Hazmi?
- 236b. [If so,] State when and where you saw those photographs?
- 236c. [If so,] Describe each photograph you saw showing Fahad al-Thumairy with either of the 9/11 hijackers, Khalid al-Mihdhar or Nawaf al-Hazmi.
- 236d. [If so,] Describe each photograph you saw showing Mohamed Johar with either of the 9/11 hijackers, Khalid al-Mihdhar or Nawaf al-Hazmi.
- 237a. [REDACTED]
- 237b. [REDACTED]
- 237c. [REDACTED]
- 237d. [REDACTED]
- 237e. [REDACTED]
- 237f. [REDACTED]
- 237g. [REDACTED]
- 238a. Did Fahad al-Thumairy ask you to do any personal favors for him at any time?

238b. [If so,] When did al-Thumairy ask you to do any personal favors for him?

238c. [If so,] What did al-Thumairy ask you to do?

238d. [REDACTED]

238e. [REDACTED]

238f. [REDACTED]

238g. [REDACTED]

238h. [REDACTED]

238i. [REDACTED]

238j. [REDACTED]

**Thumairy's travel**

239a. Did Fahad al-Thumairy have his own car?

239b. Did you ever drive anywhere with al-Thumairy?

239c. [If so,] When and where did you go with al-Thumairy?

240a. Did al-Thumairy ever tell you, or were you aware, that he took driving trips outside of the Los Angeles area?

240b. [If so,] To the best of your recollection, for each trip, what was the date, location, and purpose of the trip, and how did you learn about the trip?

241a. Did al-Thumairy ever tell you either that he had travelled or planned to travel outside of the Los Angeles area to any other destination in the United States or Canada – such as San Diego, San Francisco, Arizona, Colorado, Oregon, Washington State, or Vancouver, B.C.?

241b. [If so,] Please tell us about such travel, telling us to the best of your recollection where al-Thumairy travelled, when, and the purpose of his trip?

242a. When was the last time you saw al-Thumairy before September 11, 2001?

242b. Were you aware that al-Thumairy had three visitors in August 2001?

- 242c. Were you aware that, in August 2001, an official from the Saudi Ministry of Islamic Affairs visited al-Thumairy?
- 242d. [If so,] If you know the identity of any visitors who visited al-Thumairy in August 2001, who were those visitors, and what do you recall about the visitors?
- 243a. Do you recall that Fahad al-Thumairy left the United States in August 2001?
- 243b. [If so,] What do you remember about Fahad al-Thumairy leaving the United States in August 2001?
- 243c. Did you hear Fahad al-Thumairy speak about his plans to leave the United States in August 2001?
- 243d. [If so,] What did he say?
- 243e. Based on your personal knowledge and/or observations do you have any understanding as to why Fahad al-Thumairy left the United States?
- 243f. [If so,] What is your understanding?
- 243g. [If so,] How did you come to that understanding?
- 243h. Based on your personal knowledge and/or observations do you have any understanding as to why Fahad al-Thumairy has not returned to the United States?
- 243i. [If so,] What is your understanding?
- 243j. [If so,] How did you come to that understanding?

**Documents**

- 244a. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of Fahad al-Thumairy?
- 244b. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of Mohamed Johar?
- 244c. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of either of [REDACTED] and [REDACTED]?
- 244d. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of any of the other individuals we discussed earlier, Muhanna, Jaithen, Mana?
- 244e. [If so,] As to any photographs, recordings, writings, or messages of al-Thumairy, Johar, al-Hazmi, al-Mihdhar, Muhanna, Jaithen, or Mana, please describe what items you have.

- 244f. [If so] Where are the items that you have described?
- 244g. [If so] Are they accessible to you?
- 244h. [If so] When did you last see them?
- 244i. [If so] If asked, are you able to lay your hands on them to show them to the parties in this litigation?

Dated: New York, New York  
December 18, 2019

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**CERTIFICATE OF SERVICE**

I, Andrew J. Maloney III, hereby certify that a true copy of PLAINTIFFS' NOTICE OF DEPOSITION AND DIRECT EXAMINATION BY WRITTEN QUESTIONS FOR NON-PARTY WITNESS AKRAM ALZAMARI are being served via electronic mail this day of \_\_\_\_\_ upon:

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/s/ Andrew J. Maloney, III

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**PLAINTIFFS' NOTICE OF DEPOSITION AND DIRECT EXAMINATION BY WRITTEN QUESTIONS FOR NON-PARTY WITNESS AKRAM ALZAMARI**

PLEASE TAKE NOTICE that pursuant to the May 29, 2019 Order of this Court, docket entry 4564, and Rules 30 and 31 of the Federal Rules of Civil Procedure, Plaintiffs, by their counsel the Plaintiffs' Executive Committees, hereby demand that non-party witness Akram Alzamari orally answer the written questions under oath before a certified court stenographer of the Golkow Reporting firm, and while being videotaped by a certified videographer, also provided by the Golkow Litigation Services. The deposition shall commence on **[NEW DATE]** beginning at 9:00am Pacific time at the law offices of Golkow Litigation Services at The First Allied Plaza 655 W. Broadway, Suite 880, San Diego, CA 92101.

PLEASE TAKE FURTHER NOTICE that the Direct Questions set forth below are being provided to Mr. Alzamari's counsel, Kelly Moore, Esq., of Morgan Lewis & Bockius LLP, to allow his counsel to raise objections as provided in the Court's Order in advance of the deposition. These Direct Examination Questions and any Cross, Redirect, and Re-Cross Questions, shall be read by the certified court reporter or his/her designee to ask the witness each question; the witness must answer each question while under oath, in his own words, and not from a prepared response; and, the reporter and videographer shall record the answers verbatim.

PLEASE TAKE FURTHER NOTICE that the Plaintiffs' Executive Committees have assigned the following attorney point of contact for this deposition:

Andrew J. Maloney, Esq.  
Kreindler & Kreindler LLP  
750 Third Avenue  
New York, NY 10017  
Phone: 212-973-3438  
[amaloney@kreindler.com](mailto:amaloney@kreindler.com)

PLEASE TAKE FURTHER NOTICE that Plaintiffs continue to object to this written deposition procedure, and reserve their rights to demand an oral deposition of the witness after the completion of the deposition upon written questions, or to seek such other appropriate relief that may be necessary in the interests of justice. Objections lodged by defense counsel and by the witness's lawyer have been served and preserved and need not be lodged verbally before the witness at the deposition.

### **PLAINTIFFS' DIRECT WRITTEN QUESTIONS FOR AKRAM ALZAMARI**

Please advise the witness that unless the question begins with the words "Before and after September 11, 2001:" all of the Direct Questions relate to events that occurred on dates prior to and including September 11, 2001, and not after that date.

Where a question is preceded by "[If so]" or otherwise conditioned on a certain answer to a prior question, such follow up questions will only be asked if the condition is first satisfied. Subject headings are not questions and need not be read to the witness. The witness should be instructed that "all answers to questions should be based on your personal knowledge, and/or observations, and are intended to elicit the basis of your knowledge on how you know those answers.

#### **Background**

1. Please state and spell your name for the record.
  - 1.a DELETED
2. Have you ever used any other names, nicknames, or aliases?
  - a. [If so,] state and spell any other names.
    - i. [If so,] When did you use each other name?
    - ii. [If so,] Why did you use each other name?
  - b. [If so,] State and spell other nicknames.
    - i. [If so,] When did you use each nickname?
    - ii. [If so,] Why did you use each nickname?
  - c. [If so,] State and spell any other aliases that you have used.
    - i. [If so,] When did you use each other alias?

ii. [If so,] Why did you use each other alias?

3. Please state your date and place of birth?
4. Please state [REDACTED]?
  - a. What degrees, if any, did you obtain from [REDACTED]?
  - b. [REDACTED] When did you obtain those degrees?
5. Please identify all other places that you have resided from September 11, 1991 through September 11, 2001, identifying the locations and the times of residency.
6. Between September 11, 1991 and September 11, 2001, please identify all countries to which you have travelled for more than a day, identifying the countries, the times that you were there, and the reasons for the visits.
7. When did you first travel to the United States?
8. Have you lived continuously in the U.S. since that time?
9. Why did you come to the U.S.?
10. When did you become a U.S. citizen?
11. Please state where and when you attended college and graduate school.
  - a. [REDACTED] identify any degrees that you have obtained – including where you obtained it, when, and the area of study.

[REDACTED]
12. [REDACTED]
13. Directing your attention to the period of time from January 1, 1995 through September 2001, to the best of your recollection, please identify the addresses of each place where you lived during that period, including the location and the dates that you lived at each address.
14. Did you live with anyone else during the period from January 1, 1995 through September 2001?
  - a. [If so,] Who else did you live with during the period from January 1, 1995 through September 2001?

- b. [If so, as to each] At what address did you live with each person?
  - c. [If so, as to each] When did they live with you?
- 15. Were you employed from January 1, 1995 through September 2001?
- 16. [If so,] Please list each of your employers and their location, and when you worked there.
  - a. [As to each,] What was your job title and what you did for each employer.
- 17. Did you regularly attend religious or other services at a mosque and/or at any Islamic centers in California during the period from January 1, 1995 through September 2001?
- 18. What mosques and Islamic centers did you attend in California, where were they located, and when did you attend?
- 19. Which services did you regularly attend at each location that you identified?
  - a. As to each service you attended regularly, for what time period did you attend that service regularly?

**Fahad al-Thumairy**

Showing you photo Exhibit 7 [Fahad al-Thumairy]

- 20a
  - i. do you recognize this man as someone you saw prior to the 9/11 attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] how did you address him when you met him in person?
  - iv. [if so] what other information can you remember about this man?
  - v. [if so] when and where do you remember seeing this man prior to 9/11?
  - vi. [if so] describe your relationship with this man prior to 9/11?
- 20. Did you know Fahad al-Thumairy?
- 21. When did you first meet Fahad al-Thumairy?
- 22. How did you come to meet Fahad al-Thumairy?

- 23. Where did you first meet Fahad al-Thumairy?
- 24. Before or after September 11, 2001: When was the last time that you saw Fahad al-Thumairy in person?
- 25. What were the circumstances under which you last saw Fahad al-Thumairy in person?
- 26a. Can you describe your relationship with Fahad al-Thumairy in the 1995-2001 time period?
- 26b. Did you consider Fahad al-Thumairy to be your friend, and if so, how close were you?
- 27a. What language did you typically use to communicate with Fahad al-Thumairy?
- 27b. What language did you observe Fahad al-Thumairy typically use to communicate with others when you saw him in or around Los Angeles?
- 27c. How was al-Thumairy's English?
- 27d. Did he ever use anyone to translate for him?
- 27e. [If so,] Who did he use to translate for him?
- 27f. [If so] Do you know where that person is or how to get in touch with that person?
- 27g. [If so,] Where is that person or how can that person be contacted?
- 28a. Did you and al-Thumairy contact each other by email?
- 28b. [If so,] What email address or addresses did al-Thumairy use?
- 29a. Did you and al-Thumairy contact each other by phone, either land line or cell phone?
- 29b. [If so] What were the land line and cell phone numbers that you used to call al-Thumairy?
- 29c. [If so] What were your land line and cell phone numbers that Thumairy used to call you?
- 30a. Did you ever hear Fahad al-Thumairy talk about his employment?
- 30b. [If so,] What did he say about his employment?
- 30c. Did you ever hear Fahad al-Thumairy talk about who he reported to in his job?

- 30d. [If so,] When did that occur?
- 30e. [If so,] What did al-Thumairy say about who he reported to in his job?
- 31a. At the time you knew him in Los Angeles, were you aware that Fahad al-Thumairy was employed by the Saudi government?
- 31b. [If so,] Based on your personal knowledge and/or observations, what was your understanding of Fahad al-Thumairy's job for the Saudi government?
- 31c. Where did al-Thumairy work?
- 31d. Who did he report to?
- 31e. [If so] How did you know that?
- 32a. Did you ever hear Fahad al-Thumairy talk about his work for the Kingdom of Saudi Arabia?
- 32b. [If so,] To the best of your recollection, when did he make the statements?
- 32c. [If so,] What did al-Thumairy say about his work for the Kingdom of Saudi Arabia?
- 33a. Did Fahad al-Thumairy ever talk about working at the Saudi Consulate in Los Angeles?
- 33b. Did al-Thumairy describe where his work office was located?
- 33c. [If so,] To the best of your recollection, when did he offer that description?
- 33d. [If so,] What did al-Thumairy say about where his work office was located?
- 33e. Did you ever see his work office?
- 33f. [If so,] Where was it?
- 33g. [If so,] What were the circumstances that occasioned you being in his office?
- 34a. Did you ever hear Fahad al-Thumairy complain about his work and/or his superiors?
- 34b. [If so,] To the best of your recollection, when did al-Thumairy complain?
- 34c. [If so,] What did al-Thumairy say in complaining about his work or his superiors?

- 35a. Did you ever hear Fahad al-Thumairy say that he was a diplomat for Saudi Arabia or that he held a diplomatic visa?
- 35b. [If so,] To the best of your recollection, when did al-Thumairy say that?
- 35c. [If so,] What did al-Thumairy say about being a diplomat for Saudi Arabia or about holding a diplomatic visa?
- 36a. Did Fahad al-Thumairy ever talk about his relationships with any Saudi government personnel?
- 36b. [If so,] To the best of your recollection, when did that occur and what did al-Thumairy say?
- 37a. Did you ever hear Fahad al-Thumairy express any criticism of the United States or its government?
- 37b. [If so,] To the best of your recollection, when did you hear this?
- 37c. [If so,] What did al-Thumairy say in criticism of the United States or its government?
- 38a. Did Fahad al-Thumairy ever send customers to you when you were working at Circuit City?
- 38b. [If so] Did Fahad al-Thumairy ever provide you with the names of customers when you were working at Circuit City?
- 38c. [If so,] If Fahad al-Thumairy sent you customers or provided you with customer names, to the best of your recollection, who were those customers?
- 38d. [If so,] What did al-Thumairy say to you about each of those customers?
- 39a. Did al-Thumairy ever introduce you to any Saudi government personnel, either in person or by either giving you their name, or providing your name to them?
- 39b. [If so,] To the best of your recollection, who were those personnel?
- 39c. [If so] What, if anything, did al-Thumairy say to you about them?
- 39d. [If so] What, if anything, did you learn about the positions those personnel held?
- 39e. [If so.] How did you learn that?



- 39f. Did you ever hear al-Thumairy speak about any Saudi government personnel who were visiting Los Angeles or the King Fahad Mosque?
- 39g. [If so,] To the best of your recollection, who were those personnel?
- 39h. [If so,] What did al-Thumairy say about them?
- 40a. Were any of your customers at Circuit City Saudi government officials, including Saudi Consulate officials?
- 40b. [If so,] Who were those officials, and what interactions did you have with those officials?
- 40c. Did you know any Saudi government officials, including officials from the Saudi Consulate in Los Angeles?
- 40d. [If yes,] What is or are the name or names of the Saudi government officials you know?
- 40e. [If yes,] What is the title and position of the Saudi government officials you know?
- 40f. [If yes,] How do you know these Saudi government officials?
- 40g. Have you met any members of the Saudi Royal Family?
- 40h. [If yes] Who did you meet and when?
- 40i. [If yes] Describe the circumstances of the meeting, who was there and what was said and by whom?

Showing you a photo marked as Exhibit 14 [Prince Abdulaziz]

- 40j (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] what other information can you remember about the man?
  - iv. [if so] when and where do you remember seeing the man prior to 9/11?
  - v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.
- 40j. Have you ever met Prince Abudulaziz bin Fahd?

- 40k. [If so] When, where, and why?
- 40l. [If yes] Describe the circumstances of the meeting, who was there, and what was said and by whom?
- 40m. Have you ever met Khalid bin Nasser al Assaf?
- 40n. [If yes] When, where, and why did you meet Khalid bin Nasser al Assaf?
- 40o. [If yes] Describe the circumstances of the meeting, who was there, and what was said and by whom?
- 40p. To the extent that you interacted with any Saudi government officials, including Consulate officials, when did that happen?
- 40q. [If so] Describe the conversations that you have had with any Saudi government officials.
- 41a. [If so,] To the best of your recollection, please state when each conversation happened?
- 42a. Did you ever hear Fahad al-Thumairy speak about any of the Saudi government personnel at the Consulate in Los Angeles?

Showing you photo Exhibit 13 [Mohamed al Salloum]

- 42b (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?
- ii. [if so] what is the man's name?
- iii. [if so] what other information can you remember about the man?
- iv. [if so] when and where do you remember seeing the man prior to 9/11?
- v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11. 42b. Did you ever hear him speak about the Consul General Mohammed al-Salloum?
- 42c. Did you ever hear him speak about another official, Abdullah al-Awad?
- 42d. If so, to the best of your recollection, when did that happen and what did al-Thumairy say?
- 43a. Did you ever hear Fahad al-Thumairy talk about any Saudi government officials at the Embassy in Washington, D.C.?

43b. [If so,] To the best of your recollection, when did that happen?

43c. [If so,] What did al-Thumairy say about any Saudi government officials at the Embassy in Washington, D.C.?

Showing you photo Exhibit 10 [Musaed al-Jarrah]

44a (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

44a. Did you ever hear Fahad al-Thumairy talk about an Embassy official named Musaed al-Jarrah?

44b. [If so,] To the best of your recollection, when did that occur and what did al-Thumairy say?

Showing you photo Exhibit 12 [Khalid al-Sowailem]

44c (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

44c. Did you ever hear Fahad al-Thumairy talk about an Embassy official named Khalid al-Sowailem?

- 44d. [If so,] To the best of your recollection, when did that occur and what did al-Thumairy say?
- 45a. Did Fahad al-Thumairy ever talk about the role of the Kingdom of Saudi Arabia, including its Consulate in Los Angeles, in the operation of the King Fahad Mosque?
- 45b. [If so,] To the best of your recollection, when did that discussion happen and what did al-Thumairy say?
- 46a. Based on your personal knowledge and/or observations do you have an understanding of the role of the Saudi government in the operation of the King Fahad Mosque prior to September 11, 2001?
- 46b. Based on your personal knowledge and/or observations what is your understanding of the role of the Saudi government in the operation of the King Fahad Mosque prior to September 11, 2001?
- 46c. [If so,] What is the basis for your understanding?
- 47a. Did you ever hear Fahad al-Thumairy talk about Saudi government intelligence personnel in the United States, including at the Saudi Consulate in Los Angeles?
- 47b. [If so,] To the best of your recollection, when did that talk occur and what did al-Thumairy say?
- 47c. Did you ever hear Fahad al-Thumairy talk about hosting or meeting with visitors from the Saudi government, including from the Ministry of Islamic Affairs?
- 47d. [If so,] To the best of your recollection, when did that talk occur?
- 47e. [If so,] What did al-Thumairy say about hosting or meeting with visitors from the Saudi government, including from the Ministry of Islamic Affairs?
- 47f. Did you have occasion to observe any Saudi government visitors hosted by or meeting with al-Thumairy?
- 47g. [If so,] Please tell us what you recall observing.
- 47h. [If so] Tell us the names and positions of any Saudi government visitors that you observed meeting with Al-Thumairy?
- 47i. [If so,] Was al-Thumairy hosting them?

- 47j. [If so,] What was the purpose of the visitors' trip to Los Angeles?
- 47k. [If so,] Did you meet them?
- 47l. [If so,] When did you meet with them?
- 47m. [If so,] What was the purpose of your meeting with them?
- 47n. [If so,] Who else was present for that meeting?
- 47o. If you had or overheard any conversations with any Saudi government visitors, please tell us what you heard, who else was present during the conversations, and when the conversations occurred.
- 48a. Based on your personal knowledge and/or observations what understanding do you have, if any, as to the role of the Saudi government intelligence personnel in the United States prior to September 11, 2001?
- 48b. [If so,] Can you please explain the basis for your understanding?
- 49a. Do you know if Fahad Thumairy was receiving a salary and/or expenses?
- 49b. [If yes] How do you know this?
- 49c. [If yes] Who was paying Thumairy his salary and/or his expenses?
- 49d. Do you know if Thumairy was receiving money that he used to fund or pay other people or entities?
- 49e. [If yes] How do you know this?
- 49f. [If yes] Where was Thumairy getting the money from?
- 49g. [If yes] Who was Thumairy paying the money to?
- 49h. [If yes] Do you have an estimate of any of the dollar amounts that Thumairy received and what time period that was when he was funding others?
- 49i. [If yes] Do you have an estimate as to how much Thumairy paid to others during the time period 1998-2001?

**Ibn Tammiyah Mosque**

- 50a. Did you attend the Ibn Tammiyah Mosque on Venice Boulevard in Los Angeles, California?

- 50b. [If so,] During what period of time did you attend the Ibn Tammiyah Mosque?
- 51. Why did you choose to go to that particular Mosque?
- 52. How often did you typically attend the Ibn Tammiyah Mosque?
- 53. Was Fahad al-Thumairy an Imam at the Ibn Tammiyah Mosque when you attended the Mosque?
- 54. What was the role of Fahad al-Thumairy at that Mosque?
- 55. Who did you observe deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque when you attended that Mosque?
- 56a. Did you ever observe Fahad al-Thumairy deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque?
- 56b. [If so,] How often and when did you observe Thumairy deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque?
- 56c. [If so,] Did you observe him deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque on more than one occasion?
- 56d. [If so,] Can you approximate a number of times you observed Fahad al-Thumairy deliver the Friday Khutbah prayer at the Ibn Tammiyah Mosque?
- 56e. Did you ever hear that Sheik Omar Abdul Rahman - who was known as “the Blind Sheik” - had visited the Ibn Tammiyah Mosque?
- 56f. [If so,] Please describe what you heard, and describe what was said, and by whom.

**King Fahad Mosque**

- 57a. Did there come a time when you attended the King Fahad Mosque on Washington Boulevard in Culver City, California?
- 57b. [If so,] During what period of time did you attend the King Fahad Mosque?
- 58. Why did you choose to go to that particular Mosque?
- 59. How often did you typically attend the King Fahad Mosque?

- 60. Was Fahad al-Thumairy the Imam at the King Fahad Mosque when you attended the Mosque?
- 61. What was the role of Fahad al-Thumairy at that Mosque?
- 62a. Did you ever observe Fahad al-Thumairy deliver the Friday Khutbah prayer at the King Fahad Mosque?
- 62b. [If so,] How often and when did you observe Thumairy deliver the Friday Khutbah prayer at the King Fahad Mosque?
- 62c. [If so,] Did you observe him deliver the Friday Khutbah prayer at the King Fahad Mosque on more than one occasion?
- 62d. [If so,] Can you approximate a number of times you observed Fahad al-Thumairy deliver the Friday Khutbah prayer at the King Fahad Mosque?
- 63a. Did you ever hear Fahad al-Thumairy talk about instructions he received from the Saudi Consulate or the Saudi government regarding the King Fahad Mosque?
- 63b. [If so,] To the best of your recollection, when did you hear this and what did al-Thumairy say?
- 64a. Based on your personal knowledge and/or observations had you heard of the Saudi Ministry of Islamic Affairs, and its involvement in the operation of the King Fahad Mosque?
- 64b. What had you heard, and from whom?
- 64c. Based on your personal knowledge and/or observations what understanding, if any, do you have regarding any role the Saudi government may have in appointing the Imam for the King Fahd Mosque?
- 65. Can you describe your relationship with the Board members of the King Fahad Mosque, Dr. Khalil al-Khalil and Dr. Osman Kaldirim?
- 66a. Did you ever hear Fahad al-Thumairy talk about Dr. Khalil al-Khalil?
- 66b. [If so,] To the best of your recollection, when did al-Thumairy talk about Dr. al-Khalil and what did al-Thumairy say?
- 67a. When you were working at Circuit City, did Dr. Khalil ever send customers to you or provide you with the names of customers?

- 67b. [If so,] What did he do to refer you customers?
- 67c. [If so,] To the best of your recollection, who were those customers?
- 67d. [If so,] What did Dr. Khalil say to you about those customers that he referred to you?
- 68a. Did you ever hear Fahad al-Thumairy talk about Osman Kaldirim?
- 68b. [If so,] To the best of your recollection, when did al-Thumairy talk about Kaldirim and what did al-Thumairy say?
- 69a. Do you remember any occasion when al-Thumairy offered to introduce you to the influential inner circle of people at the King Fahad Mosque?
- 69b. [If so,] To the best of your recollection, what did he say to you, and how did you respond?
- 69c. [If so] Who, if anyone, did al-Thumairy tell you were the members of that influential inner circle at the King Fahad Mosque?
- 70a. Do you know the names of any of the drivers that the King Fahd Mosque used in the year 2000?
- 70b. [If so,] Who were those drivers?
- 70c. [If so,] Please provide us with any contact information for each driver that you recall the King Fahd Mosque using in the year 2000.
- 70d. [If so,] Who did those drivers transport and where did they typically go?
- 70e. [If so,] Did the drivers pick up visitors arriving at the airport?
- 70f. [If so,] Please state what you recall about any occasion when a driver for the Mosque picked up a visitor at the airport.
- 71a. Were you aware of any faction of people who attended the King Fahad Mosque who held an extremist view of Islam?
- 71b. [If so,] Who were they and what did you observe about their extremist view of Islam?
- 71c. Was Fahad al-Thumairy associated with this faction?



71d. [If so,] Please explain how al-Thumairy was associated and describe what you observed?

Showing you photo Exhibit 9 [Mohamed al-Muhanna]

71e (1) i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

71e. [If so] Was Mohamed al-Muhanna associated with this faction with extremist views?

71f. [If so,] Please explain how al-Muhanna was associated and describe what you observed?

### **Grand Opening**

72. Did you attend the Grand Opening ceremonies of the King Fahad Mosque?

73a. [If so] Did you observe any Saudi government officials at the Opening?

73b. [If so,] Who were those officials and what did you observe?

74a. [If so] Did Fahad al-Thumairy talk about the Grand Opening of the King Fahad Mosque, and his duties during the Grand Opening?

74b. [If so,] To the best of your recollection, when did that occur?

74c. [If so,] What did al-Thumairy say about the Grand Opening?

75a. [If so] Did you observe al-Thumairy with other Saudi government officials or visitors at the Grand Opening?

75b. [If so,] Who was al-Thumairy with?

75c. [If so,] What was he doing?

- 75d. [If so] Did Thumairy meet with Prince Abudulaziz bin Fahd at the Grand Opening of the King Fahd Mosque?
- 75e. [If so,] Please describe their interactions, and tell us your knowledge of what they said to one another, and the basis for that knowledge?

**Saudi Consulate**

- 76a. Did you ever go to the Saudi Consulate in Los Angeles?
- 76b. [If so,] When did you go?
- 76c. [If so,] Who did you meet with and why?
- 77a. Did al-Thumairy offer to introduce you to important or influential Saudi officials at the Saudi Consulate?
- 77b. [If so,] When did that occur – that is, when did he make that offer to you?
- 77c. [If so,] What did al-Thumairy say to you?
- 77d. [If so,] What happened as a result?
- 78a. Did the Saudi Consulate employ drivers to pick up visitors when they arrived at the airport in Los Angeles?
- 78b. Did the Saudi Consulate employ drivers to drive visitors around Los Angeles?
- 78c. [If so,] When do you recall instances of the Saudi Consulate employing drivers either to pick visitors up from the airport or drive visitors around Los Angeles?
- 78d. [If so,] Who were those drivers?
- 78e. [If so,] Tell us what you remember about any trips that the drivers took?
- 78f. Did the Saudi Consulate ever use drivers from the King Fahd Mosque to pick up visitors arriving at the airport?
- 78g. [If so,] When did that happen?
- 78h. [If so,] Who were the drivers from the King Fahd Mosque that the Saudi Consulate used?
- 78i. [If so,] Tell us what you remember about any trips that they took?

**Mohamed al-Muhanna**

- 79. Did you know Mohamed al-Muhanna?
- 80. [If so] Can you describe your relationship with Mohamed al-Muhanna?
- 81a. Did you ever hear Fahad al-Thumairy talk about Mohamed al-Muhanna?
- 81b. [If so,] To the best of your recollection, when did you hear al-Thumairy talk about al-Muhanna?
- 81c. [If so,] What did al-Thumairy say about al-Muhanna?
- 82a. [If so] Where was Mohamed al-Muhanna employed?
- 82b. [If so] What is your understanding of what al-Muhanna's job entailed?
- 82c. [If so] How did you know that?
- 83a. [If so] Did al-Muhanna have any responsibilities at the King Fahad Mosque?
- 83b. [If so,] What were those responsibilities?
- 84a. [If so] Did you ever hear Mohamed al-Muhanna express any criticism of the United States or its government?
- 84b. [If so,] To the best of your recollection, when did you hear this?
- 84c. [If so,] What did al-Muhanna say?

**Smail Mana**

- 85. Did you know Smail Mana?
- 86. [If so] Can you describe your relationship with Smail Mana?
- 87a. Did you ever hear Fahad al-Thumairy talk about Smail Mana?
- 87b. [If so,] To the best of your recollection, when did you hear al-Thumairy talk about Smail Mana?
- 87c. [If so,] What did al-Thumairy say about Smail Mana?

- 88a. [If so] Where was Smail Mana employed?
- 88b. [If so] What is your understanding of what Mana's job entailed?
- 88c. [If so] How did you know that?
- 89a. [If so] Did Mana have any responsibilities at the King Fahad Mosque?
- 89b. [If so,] What were those responsibilities?
- 89c. [If so,] What, if anything, did you observe him do?
- 90a. [If so] Did you ever have any conversations with Smail Mana?
- 90b. [If so,] To the best of your recollection, tell us what Smail Mana said and what you said in that conversation.
- 90c. [If so] Did you ever hear Smail Mana express any criticism of the United States or its government?
- 90d. [If so,] To the best of your recollection, when did you hear this?
- 90e. [If so,] What did Mana say?

**Minister of Islamic Affairs**

- 91a. Did you ever hear Fahad al-Thumairy talk about Saudi Minister of Islamic Affairs Abdullah al-Turki?
- 91b. [If so,] To the best of your recollection, when did al-Thumairy mention Minister al-Turki?
- 91c. [If so,] What did al-Thumairy say about Saudi Minister of Islamic Affairs Abdullah al-Turki?
- 91d. Did you ever hear Fahad al-Thumairy talk about Saudi Minister of Islamic Affairs Saleh al-Shaikh?
- 91e. [If so,] To the best of your recollection, when did al-Thumairy mention Minister al-Shaikh?
- 91f. [If so,] What did al-Thumairy say about Saudi Minister of Islamic Affairs Saleh al-Shaikh?

**Omar al-Bayoumi**

Showing you photo Exhibit 8 [Omar al Bayoumi]

- 92a i. do you recognize this man as someone you saw prior to the 9/11 Attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] what other information can you remember about this man?
  - iv. [if so] when and where do you remember seeing this man prior to 9/11?
  - v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy prior to 9/11.
  - vi. [if so] describe your relationship with this man prior to 9/11?
92. Did you know or had you heard of Omar al-Bayoumi?
93. [If so] Can you describe your relationship with Omar al-Bayoumi?
- 94a. Did Fahad al-Thumairy ever mention Omar al-Bayoumi?
- 94b. [If so,] To the best of your recollection, when did al-Thumairy mention al-Bayoumi?
- 94c. [If so,] What did al-Thumairy say about Omar al-Bayoumi?
- 95a. [If you knew Omar al-Bayoumi,] At the time you knew him, did you know whether Omar al-Bayoumi was employed?
- 95b. [If so,] What was your understanding of al-Bayoumi's job?
- 95c. [If so,] How did you know that?
- 96a. [If so] Did you ever see Omar al-Bayoumi at the Ibn Tammiyah Mosque?
- 96b. [If so] Did you ever see Omar al-Bayoumi at the King Fahad Mosque?
- 96c. [If so] [If you ever saw Omar al-Bayoumi at either mosque,] Please describe when and where you saw Omar al-Bayoumi?
- 96d. [If so,] Who else was present at each occasion that you recall seeing Omar al-Bayoumi?

- 96e. [If so] Describe the content of any conversations of al-Bayoumi that you heard, including the content of the conversation and the participants of the conversation.

**Anwar Aulaqi**

Showing you photo Exhibit 11 [Anwar Aulaqi]

- 97a i. do you recognize the man in the photo as someone you saw prior to the 9/11 Attack?

ii. [if so] what is the man's name?

iii. [if so] what other information can you remember about the man?

iv. [if so] when and where do you remember seeing the man prior to 9/11?

v. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy or Omar Bayoumi prior to 9/11.

97. Did you know Anwar Aulaqi?

98a. [If so,] Describe your relationship with Anwar Aulaqi, including how and when you met him.

98b. [If so] Are you aware of any visits of Anwar Aulaqi to the Los Angeles area, including the Ibn Tammiyah Mosque or the King Fahad Mosque?

98c. [If so,] Describe when and what the circumstances were?

98d. [If so,] Who met with Aulaqi?

98e. [If so,] Who was present at the meetings?

98f. [If so,] What was said and by whom?

99a. [If so] Did you ever speak with Aulaqi?

99b. [If so,] When and where did that occur?

99c. [If so,] What did you talk to him about?

99d. [If so,] Who else was present?

**Mohamed Johar**

Showing you photo Exhibit 6 [Mohamad Johar]

- 100a i. do you recognize this man as someone you saw prior to the 9/11 Attack?

- ii. [if so] what is the man's name?
- iii. [if so] how did you address him when you met him in person?
- iv. [if so] what other information can you remember about this man?
- v. [if so] when and where do you remember seeing this man prior to 9/11?
- vi. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy prior to 9/11.
- vii. [if so] describe your relationship with this man prior to 9/11?

100. Did you know Mohamed Johar?

101. [If so,] When and where did you first meet Mohamed Johar?

102. When was the last time that you saw Mohamed Johar in person,

103. What were the circumstances under which you last saw him?

104. When was the last time you had any communication with him?

105. Can you describe your relationship with Mohamed Johar?

106a. Did you consider Mohamed Johar to be your friend?

106b. [REDACTED]

107. Where did Mohamed Johar live in January 2000?

108a. Can you describe the building where Mohamed Johar lived in January 2000?

108b. Did you ever visit the building where Mohamed Johar lived [REDACTED]

108c. [If so,] How often did you visit Johar at that building

108d. [If so,] What was the purpose of your visits to that building?

108e. [REDACTED]

108f. [REDACTED]

[REDACTED]

109a. [REDACTED]

109b. [REDACTED]

109c. [REDACTED]

110. [REDACTED]

111. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

112a. Does this passage help refresh your recollection that [REDACTED]

112b. Is the passage true?

112c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

113. [REDACTED]

114. [REDACTED]

115. [REDACTED]

116a. [REDACTED]



116b. [REDACTED]

117a. [REDACTED]

117b. [REDACTED]

117c. Please review this photo Exhibit. 3 [Khalid al Mihdhar] Do you recognize this man as someone you saw prior to the 9/11 Attack?

117d. [If so] What is the man's name?

117e. [If so] How did you address him when you met him in person?

117f. [If so] Is this one of the two Saudi men who would later become 9/11 hijackers?

117g. Please review this photo Ex. 4 [Nawaf al Hazmi]

117h. Do you recognize this man as someone you saw prior to the 9/11 Attack?

117i. [If so] What is the man's name?

117j. [if so] How did you address him when you met him in person?

117k. [if so] Is this one of the two Saudi men who would later become 9/11 hijackers?

118a. Did you ever learn that the two Saudi men who would later become 9/11 hijackers were both associated with or supporters of Osama Bin Laden and/or al Qaeda?

118b. [If so,] When did you learn about the support or association of the two men with Osama Bin Laden and/or al Qaeda?

118c. [If so,] How did you learn about the support or association of the two men with Osama Bin Laden and/or al Qaeda?

118d. [If so,] What did you learn about the support or association of the two men with Osama Bin Laden and/or al Qaeda?

118e. Did you ever suspect or receive information that the two Saudi men who would later become 9/11 hijackers were both in the United States to carry out some assignment for Osama Bin Laden and/or al Qaeda?

118f. [If so,] To the best of your recollection, when did you learn about their assignment?

118g. [If so,] How did you learn about their assignment?

118h. [If so,] What did you learn about their assignment?

118i. Before or after September 11, 2001: When and how did you learn that the two Saudi men who would later become 9/11 hijackers were hijackers involved in the 9/11 Attacks?

119a. Before or after September 11, 2001: Did there come a time when you learned the names of the two Saudi men who would later become 9/11 hijackers?

119b. [If so,] What were those names?

119c. [If so,] Before or after September 11, 2001: When and how did you learn the names of the two men?

119d. Is it correct that the names of the two men were Nawaf al-Hazmi and Khalid al-Mihdhar?

120a. [REDACTED]

120b. [REDACTED]

120c. [REDACTED]

120d. [REDACTED]

121a. [REDACTED]

121b. [REDACTED]

122. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

123a. Does this passage help refresh your recollection that [REDACTED]

123b. Is it correct that [REDACTED]

123c. Otherwise, is this passage true?

123d. [If the answer is not “yes”] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

124a. [REDACTED]

124b. [REDACTED]

125a. [REDACTED]

125b. [REDACTED]

126. [REDACTED]

127. [REDACTED]

128a. [REDACTED]

128b. [REDACTED]

128c. [REDACTED]

129a. [REDACTED]

129b. [REDACTED]

129c. [REDACTED]

130a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

- 130b. Does this passage help refresh your recollection regarding [REDACTED]  
[REDACTED]
- 130c. Is the passage true?
- 130d. [If the answer is not “yes”] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.
131. Is it correct that [REDACTED]  
[REDACTED]
- 132a. [REDACTED]
- 132b. [REDACTED]
- 132c. [REDACTED]
- 132d. [REDACTED]
133. [REDACTED]
134. [REDACTED]
135. [REDACTED]
- 136a. [REDACTED]
- 136b. [REDACTED]
- 137a. [REDACTED]
- 137b. [REDACTED]
- 137c. [REDACTED]
- 138a. [REDACTED]

138b. [REDACTED]

138c. [REDACTED]

139a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

139b. Does this interview passage help refresh your recollection of [REDACTED]

139c. Is the passage accurate?

139d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error, and explain why you say that the statement contains an error or errors.

140. [REDACTED]

141. [REDACTED]

142. [REDACTED]

143a. [REDACTED]

143b. [REDACTED]

144a. [REDACTED]

144b. [REDACTED]

145a. [REDACTED]

145b. [REDACTED]

146a. [REDACTED]

146b. [REDACTED]

146c. [REDACTED]

146d. Based on your personal knowledge and/or observations what is your understanding [REDACTED]  
[REDACTED]

[REDACTED]

147a. [REDACTED]

147b. [REDACTED]

148a. [REDACTED]

148b. [REDACTED]

149a. [REDACTED]

149b. [REDACTED]

149c. [REDACTED]

150a. [REDACTED]

150b. [REDACTED]

150a. [REDACTED]

150b. [REDACTED]

150c. [REDACTED]

150d. [REDACTED]

150e. [REDACTED]

150f. [REDACTED]

151a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

151b. Does this passage help refresh your recollection of [REDACTED]  
[REDACTED]

151c. Is the passage true?


151d. [If the answer is not “yes”] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

152. [REDACTED]

153. [REDACTED]

154. [REDACTED]

155. [REDACTED]

- 
- 156a. Did there come a time when you met in person the two Saudi men who would later become 9/11 hijackers?
- 156b. [If so,] Please describe when and where, you met the two men.
- 156c. [If so,] How did you come to meet the two men?
- 156d. Did anyone introduce you to the two men?
- 156e. [If so,] Who introduced you to the two Saudi men who would later become 9/11 hijackers?
- 157a. Were you told the names of the two men?
- 157b. [If so,] Who told you?
- 157c. [If so,] What were you told?
- 157d. [If so,] What was the context in which you were told the names?
- 157e. Were the names of the two Saudi men who would later become 9/11 hijackers who you met, Nawaf al-Hazmi and Khalid al-Mihdhar?
- 158a. Did you speak to either of the two men?
- 158b. [If so,] In what language did you communicate with them?
- 158c. Did you hear either of the two men speak English?
- 158d. [If so,] Which of the two men, or both, did you hear speak English?
- 158e. [If so,] As to either or both that you heard speak English, what was their ability to speak English?
- 159a. Had you previously seen the two men?
- 159b. [If so,] Where had you seen them?
160. [If so,] Was anyone else present at that time?
161. [If so,] What was the discussion that occurred at that time?



- [REDACTED]
162. [REDACTED]
163. [REDACTED]
- 164a. [REDACTED]
- 164b. [REDACTED]
- 164c. [REDACTED]
- 164d. [REDACTED]
- 164e. [REDACTED]
- 165a. [REDACTED]
- 165b. [REDACTED]
- 165c. [REDACTED]
- 165d. [REDACTED]
- 165e. [REDACTED]
- 165f. [REDACTED]
- 166a. [REDACTED]
- 166b. [REDACTED]
- 166c. [REDACTED]
- 167a. [REDACTED]
- 167b. [REDACTED]
- 167c. Based on your personal knowledge and/or observations [REDACTED]  
[REDACTED]

167d.

168a. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

168b. Does this passage help refresh your recollection that [REDACTED]

[REDACTED]

168c. Is the passage true?

168d. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

169.

[REDACTED]

170.

[REDACTED]

171.

[REDACTED]

172.

[REDACTED]

173a.

[REDACTED]

173b.

[REDACTED]

173c.

[REDACTED]

173d.

[REDACTED]

173e.

[REDACTED]

- 173f. [REDACTED]
- 173g. [REDACTED]
- 174a. [REDACTED]
- 174b. [REDACTED]
- 175a. [REDACTED]
- 175b. [REDACTED]
- 176a. [REDACTED]
- 176b. [REDACTED]
- 176c. [REDACTED]
- 176d. [REDACTED]
- 176e. [REDACTED]
177. [REDACTED]
178. [REDACTED]
179. [REDACTED]
180. [REDACTED]
181. [REDACTED]
182. [REDACTED]

**Mohdar Abdullah**

183. Showing you photo Exhibit 5 [Modhar Abdullah]
- i. Do you recognize this man as someone you saw prior to the 9/11 Attack?
  - ii. [if so] what is the man's name?
  - iii. [if so] how did you address him when you met him in person?

- iv. [if so] what other information can you remember about this man?
- v. [if so] when and where do you remember seeing this man prior to 9/11?
- vi. [REDACTED]
- vii. [if so] describe the relationship, if any, that the man had with Fahad al-Thumairy prior to 9/11.
- viii. [if so] describe your relationship with this man prior to 9/11?

184. Where did he live?

185. What did Mohdar Abdullah do for a living?

186. Where did Mohdar Abdullah work?

187. [REDACTED]

188. Based on your personal knowledge and/or observations [REDACTED]

189a. [REDACTED]

189b. [REDACTED]

189c. Did Mohdar Abdullah know Fahad al-Thumairy?

189d. [If so,] How do you know that?

190a. Did you ever hear Fahad al-Thumairy talk about Mohdar Abdullah?

190b. [If so,] To the best of your recollection, when did you hear al-Thumairy talk about Mohdar Abdullah?

190c. [If so,] What did you hear Fahad al-Thumairy say about Mohdar Abdullah?

191a. Did you ever hear Mohdar Abdullah talk about Fahad al-Thumairy?

191b. [If so,] To the best of your recollection, when did you hear Mohdar Abdullah talk about Fahad al-Thumairy?

191c. [If so,] What did you hear Mohdar Abdullah say about Fahad al-Thumairy?

**Walid Benomrane**

192. Did you know a man named Walid Benomrane?

193. [If so,] When did you meet Walid Benomrane?

194. [If so,] Where did you meet Walid Benomrane?

195. If so,] What were the circumstances under which you met Walid Benomrane?

196. [If so] Where did he live?

197. [If so] What did he do for a living and where did he work?

198. [If so] Did he ever do any work for the King Fahad Mosque or the Saudi Consulate, and if so, what do you recall?

199. [If so] Did Walid Benomrane know the two men – al-Hazmi and al-Mihdhar?

200. [If so,] What can you tell us about the relationship between Benomrane and al-Hazmi and al-Mihdhar?

201. [If so] Did you ever see Walid Benomrane with the two men?

202. [If so,] Where did you see them together?

203. [If so,] What were the circumstances under which you saw the men together?

204a. [If so] Did Walid Benomrane know Fahad al-Thumairy?

204b. [If so] How do you know that?

205a. Did you ever hear Fahad al-Thumairy talk about Walid Benomrane?

205b. [If so,] To the best of your recollection, when did you hear Fahad al-Thumairy talk about Walid Benomrane?

205c. [If so,] What did you hear Fahad al-Thumairy say about Walid Benomrane?

206a. [If so] Did you ever hear Walid Benomrane talk about Fahad al-Thumairy?

206b. [If so,] To the best of your recollection, when did you hear Walid Benomrane talk about Fahad al-Thumairy?

206c. [If so,] What did Walid Benomrane say about Fahad al-Thumairy?

[REDACTED]

207. [REDACTED]

208. [REDACTED]

209. [REDACTED]

210. [REDACTED]

211. [REDACTED]

212. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

213a. Does this passage help refresh your recollection that [REDACTED]  
[REDACTED]

213b. Is the passage true?

213c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

214. [REDACTED]

215. [REDACTED]

216a. [REDACTED]

216b. [REDACTED]

216c. [REDACTED]

217. [REDACTED]

218. [REDACTED]

219. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

220a. Does this passage help refresh your recollection that [REDACTED]  
[REDACTED]

220b. Is the passage true?

220c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

220d. [REDACTED]

220e. [REDACTED]

221a. [REDACTED]

221b. [REDACTED]

222a. [REDACTED]

222b. [REDACTED]

223. [REDACTED]

224. [REDACTED]

225. Could you please look at Bates page [REDACTED], this purports to be a summary, prepared by the FBI, of an interview you provided to the FBI, and review the sentences which state:

[REDACTED]

- 226a. Does this passage help refresh your recollection regarding [REDACTED]  
[REDACTED]
- 226b. Is the passage true?
- 226c. [If the answer is not "yes"] Please state which part of the passage is true and which part is an error and explain why you say that the statement contains an error or errors.

227. [REDACTED]

228a. [REDACTED]

228b. [REDACTED]

228c. [REDACTED]

228d. [REDACTED]

228e. [REDACTED]

228f. [REDACTED]

228g. [REDACTED]

228h. [REDACTED]

228i. [REDACTED]

228j. [REDACTED]



228k. [REDACTED]

229a. [REDACTED]

229b. [REDACTED]

229c. [REDACTED]

229d. [REDACTED]

230a. Did you ever hear either of the two men – al-Hazmi or al-Mihdhar -express any criticism of the United States or its government?

230b. [If so,] To the best of your recollection, please describe each occasion when you heard either of the two men express criticism of the United States or its government, including which of the two men was speaking, what he said, and who was present.

231a. Did you ever hear either of the two men – al-Hazmi or al-Mihdhar – talk about Fahad al-Thumairy?

231b. [If so,] To the best of your recollection, please describe each occasion when did you heard either of the two men talk about Fahad al-Thumairy, including which of the two men was speaking, what he said, and who was present.

232a. Do you recall ever hearing Fahad al-Thumairy talk about either of the two Saudi men who would later become 9/11 hijackers, Nawaf al-Hazmi and Khalid al-Mihdhar?

232b. [If so,] To the best of your recollection, when did that occur?

232c. [If so,] What did al-Thumairy say about either of the two men – al-Hazmi or al-Mihdhar?

233a. Did you ever learn that the two men – al-Hazmi and al-Mihdhar -had met with Omar Bayoumi?

233b. [If so,] How did you learn that either of the two men had met with Omar Bayoumi?

233c. [If so,] When did you learn that either of the two men had met with Omar Bayoumi?

233d. [If so,] To your understanding, which of the two, or both, met with Bayoumi?

233e. [If so,] When did that meeting take place?

- 234a. [REDACTED]
- 234b. [REDACTED]
- 235a. Before or after September 11, 2001: Did the FBI show you pictures of the two men, Nawaf al-Hazmi and Khalid al-Mihdhar, two of the hijackers involved in the 9/11 Attacks?
- 235b. [If so] Were you able to identify those pictures as the persons that you saw with Fahad al-Thumairy?
- 236a. Before or after September 11, 2001: Have you ever seen or been shown any photographs of either Fahad al-Thumairy or Mohamed Johar with either of the 9/11 hijackers, Khalid al-Mihdhar or Nawaf al-Hazmi?
- 236b. [If so,] State when and where you saw those photographs?
- 236c. [If so,] Describe each photograph you saw showing Fahad al-Thumairy with either of the 9/11 hijackers, Khalid al-Mihdhar or Nawaf al-Hazmi.
- 236d. [If so,] Describe each photograph you saw showing Mohamed Johar with either of the 9/11 hijackers, Khalid al-Mihdhar or Nawaf al-Hazmi.
- 237a. [REDACTED]
- 237b. [REDACTED]
- 237c. [REDACTED]
- 237d. [REDACTED]
- 237e. [REDACTED]
- 237f. [REDACTED]
- 237g. [REDACTED]
- 238a. Did Fahad al-Thumairy ask you to do any personal favors for him at any time?

238b. [If so,] When did al-Thumairy ask you to do any personal favors for him?

238c. [If so,] What did al-Thumairy ask you to do?

238d. [REDACTED]

238e. [REDACTED]

238f. [REDACTED]

238g. [REDACTED]

238h. [REDACTED]

238i. [REDACTED]

238j. [REDACTED]

**Thumairy's travel**

239a. Did Fahad al-Thumairy have his own car?

239b. Did you ever drive anywhere with al-Thumairy?

239c. [If so,] When and where did you go with al-Thumairy?

240a. Did al-Thumairy ever tell you, or were you aware, that he took driving trips outside of the Los Angeles area?

240b. [If so,] To the best of your recollection, for each trip, what was the date, location, and purpose of the trip, and how did you learn about the trip?

241a. Did al-Thumairy ever tell you either that he had travelled or planned to travel outside of the Los Angeles area to any other destination in the United States or Canada – such as San Diego, San Francisco, Arizona, Colorado, Oregon, Washington State, or Vancouver, B.C.?

241b. [If so,] Please tell us about such travel, telling us to the best of your recollection where al-Thumairy travelled, when, and the purpose of his trip?

242a. When was the last time you saw al-Thumairy before September 11, 2001?

242b. Were you aware that al-Thumairy had three visitors in August 2001?

- 242c. Were you aware that, in August 2001, an official from the Saudi Ministry of Islamic Affairs visited al-Thumairy?
- 242d. [If so,] If you know the identity of any visitors who visited al-Thumairy in August 2001, who were those visitors, and what do you recall about the visitors?
- 243a. Do you recall that Fahad al-Thumairy left the United States in August 2001?
- 243b. [If so,] What do you remember about Fahad al-Thumairy leaving the United States in August 2001?
- 243c. Did you hear Fahad al-Thumairy speak about his plans to leave the United States in August 2001?
- 243d. [If so,] What did he say?
- 243e. Based on your personal knowledge and/or observations do you have any understanding as to why Fahad al-Thumairy left the United States?
- 243f. [If so,] What is your understanding?
- 243g. [If so,] How did you come to that understanding?
- 243h. Based on your personal knowledge and/or observations do you have any understanding as to why Fahad al-Thumairy has not returned to the United States?
- 243i. [If so,] What is your understanding?
- 243j. [If so,] How did you come to that understanding?

**Documents**

- 244a. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of Fahad al-Thumairy?
- 244b. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of Mohamed Johar?
- 244c. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of either of [REDACTED] and [REDACTED]?
- 244d. Do you have any photographs, recordings, writings, or messages – either in paper or electronic form - of any of the other individuals we discussed earlier, Muhanna, Jaithen, Mana?
- 244e. [If so,] As to any photographs, recordings, writings, or messages of al-Thumairy, Johar, al-Hazmi, al-Mihdhar, Muhanna, Jaithen, or Mana, please describe what items you have.

- 244f. [If so] Where are the items that you have described?
- 244g. [If so] Are they accessible to you?
- 244h. [If so] When did you last see them?
- 244i. [If so] If asked, are you able to lay your hands on them to show them to the parties in this litigation?

Dated: New York, New York  
December 18, 2019

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**CERTIFICATE OF SERVICE**

I, Andrew J. Maloney III, hereby certify that a true copy of PLAINTIFFS' NOTICE OF DEPOSITION AND DIRECT EXAMINATION BY WRITTEN QUESTIONS FOR NON-PARTY WITNESS AKRAM ALZAMARI are being served via electronic mail this day of \_\_\_\_\_ upon:

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